

# PORT OF HOUSTON AUTHORITY

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**Linda Henry**  
ASSOCIATE GENERAL COUNSEL  
(713) 670-2663

Via Certified Mail 7010 3090 0003 4120 8981

February 16, 2012

Mr. Gary Miller, P.E.  
Remediation Project Manager  
1445 Ross Avenue, Suite 1200  
Mail Code: 6SF-RA  
Dallas, TX 75202-2733

**RECEIVED**  
12 FEB 22 PM 1:50  
SUPERFUND DIV.  
REMEDIAL BRANCH  
(6SF-R)

Re: Comments on Soil SAP Addendum 3, South of I-10 for San Jacinto River Waste Pits  
Superfund Site Project

Dear Mr. Miller:

Enclosed are the Port of Houston Authority's comments on the Soil SAP Addendum 3, South of I-10 for the San Jacinto River Waste Pits Superfund Site Project. We would appreciate your review and consideration of these comments. If you have any questions, please contact me at 713-670-2663.

Very truly yours,

A handwritten signature in cursive script that reads "Linda Henry".

Linda Henry

Enclosure

cc: Nicole Hausler (PHA)  
Garry McMahan (PHA)



652431

February 15, 2012

**Comments on Soil SAP Addendum 3, South of I-10 for San Jacinto River Waste Pits Superfund Site Project**

On behalf of the Port of Houston Authority (PHA), HDR has reviewed the supplemental soil sampling and analysis plan addendum 3 and submits the following comments.

P 3, L 11 – Prior submissions, and presumably this reference, have used REV's that are not consistent with EPA guidance and conservative interpretations.

P 3, L 13 – Conservative screening values for workers are not protective of human health of other persons or exposures. Conservative screening concentrations for all persons who may be exposed at the site should be defined, be available for comment and be used for this analysis.

P 3, L 29 – The responsible parties claim that other wastes are the likely source of contaminants, but EPA should require that they distinguish their contribution from other likely sources.

P 4, L 7 – Reference to “conservative human health screening levels,” apparently refers to workers, which is not sufficient for protection of all persons potentially exposed.

P 4, L 12 – The proposed additional scope of sampling appears adequate to enhance the delineation required. Data from the two locations south of the South Impoundment are essential to bound the conditions and interpret results. Analyses should not be contingent on extrapolating results from within the impoundment. Environmental data are commonly highly variable; therefore, whatever the results within the impoundment area, the data from south of the impoundment are essential to characterizing and bounding the contaminant distribution.

P 5, L 4 – Reference is again made to use of screening levels for workers. As noted above, screening levels from all potentially exposed populations, not only workers, should be used.

P 5, L 18 – As noted above, screening levels from all potentially exposed populations, not only workers, should be used.


P 6, L 16 – As noted above, screening levels from all potentially exposed populations, not only workers, should be used.

P 6, L 25 – To meet the claimed objective of a “complete spatial description laterally and vertically,” samples from the two locations south of the impoundment must be analyzed.

P 7, L 11 – Reference is made to discarding samples that are not analyzed. No samples should be discarded until after the reported results are accepted by EPA.

Any questions concerning these comments should be communicated to Linda Henry, Port of Houston Authority.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas E. Pease". The signature is fluid and cursive, with a long horizontal stroke at the end.

Thomas E. Pease, PE, PhD  
Senior Professional Associate

Cc: Kerri Snyder, AICP, Project Manager  
Neil McLellan